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PUC DOCKET NO. 49737

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APPLICATION OF	§	2019 AUG -8 AM 9: US
SOUTHWESTERN ELECTRIC	§	AUTOS PARTY COMPRESION
POWER COMPANY FOR	§	PUBLIC UTILITY COMMISSION
NECESSITY AUTHORIZATION AND	§	
REQUESTED RELIEF FOR THE	§	OF TEXAS
ACQUISITION OF WIND	§	
GENERATION FACILITIES	§	

MOTION TO INTERVENE OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 738

The International Brotherhood of Electrical Workers Local Union 738 (hereinafter "IBEW 738") files this Motion to Intervene in the above-styled and docketed proceeding pursuant to sections 22.103 and 22.104 of the Texas Public Utility Commission's Rules of Procedure, and in support, shows as follows:

- 1. IBEW 738 has a justiciable interest in this proceeding, as it represents workers who work for Southwestern Electric Power Company and in the utility industry in Texas on matters relating to their health, safety, and welfare.
- 2. Hundreds of IBEW 738's members work for the applicant, and they and their families are ratepayers residing within the applicant's service territory.
- 3. IBEW 738 is concerned about issues such as fairness in rates, reliability and quality of electric service, and the health, safety, and welfare of workers employed in the utility industry in Texas.
- IBEW 738's authorized representative is: Matt Bachop Deats Durst & Owen PLLC 707 W. 34th Street, Suite 3 Austin, TX 78705 (512) 474-6200 (512) 474-7896 (fax)

WHEREFORE, For the foregoing reasons, IBEW 738 requests that this Motion to Intervene be granted and that IBEW 738 be allowed to participate in these proceedings.

Respectfully submitted,

DEATS DURST & OWEN, PLLC

Matt Bachop TBN: 24055127

mbachop@ddollaw.com 707 W. 34th Street, Suite 3

Austin, Texas 78705 (512) 474-6200 (Phone) (512) 474-7896 (Fax)

ATTORNEY FOR IBEW 738

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent by fax and/or regular, first class mail on this 6th day of August, 2019, to all parties of record.

Matt Bachop

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